

EXHIBIT D

Junk, Michael L. (mjunk@groom.com)

From: jdahl@erisaattorneyintexas.com
Sent: Friday, May 10, 2019 2:52 PM
To: Junk, Michael L. (mjunk@groom.com)
Subject: RE: Keys

Thanks Michael.

Let me run it by Lanse. Looks reasonable to me although I added a footnote just reserving our right to object to any discovery when the time comes.

Working on a settlement demand but it's been difficult....

Jeff

-----Original Message-----

From: "Junk, Michael L. (mjunk@groom.com)" <MJunk@groom.com>
Sent: Friday, May 10, 2019 12:02pm
To: "jdahl@erisaattorneyintexas.com" <jdahl@erisaattorneyintexas.com>
Subject: RE: Keys

Jeff,
I'm attaching a joint motion to extend our deadlines. I suggest to the court that we submit a new plan following a ruling on the pending MTD. What do you think of something like this?

Michael L Junk / Of Counsel / 1701 Pennsylvania Ave., NW, Suite 1200 / Washington, DC 20006 / Phone: 202-861-5430 / Fax: 202-659-4503 / www.groom.com / mjunk@groom.com

From: jdahl@erisaattorneyintexas.com <jdahl@erisaattorneyintexas.com>
Sent: Monday, May 6, 2019 9:28 PM
To: Junk, Michael L. (mjunk@groom.com) <MJunk@groom.com>
Subject: RE: Keys

Sounds good. Thanks Michael

-----Original Message-----

From: "Junk, Michael L. (mjunk@groom.com)" <MJunk@groom.com>
Sent: Monday, May 6, 2019 5:57pm
To: "jdahl@erisaattorneyintexas.com" <jdahl@erisaattorneyintexas.com>
Subject: RE: Keys

Thanks. And yes, I'll talk to my local and put together a joint motion of some sort. Will report back.

Michael L Junk / Of Counsel / 1701 Pennsylvania Ave., NW, Suite 1200 / Washington, DC 20006 / Phone:
202-861-5430 / Fax: 202-659-4503 / www.groom.com / mjunk@groom.com

From: jdahl@erisaattorneyintexas.com <jdahl@erisaattorneyintexas.com>
Sent: Monday, May 6, 2019 3:45 PM
To: Junk, Michael L. (mjunk@groom.com) <MJunk@groom.com>
Subject: RE: Keys

I agree.

After I sent you the previous email it occurred to me that since there's been no decision on your motion to dismiss, just as you say, we wouldn't know what to brief anyway (or, out of caution, we would waste our time briefing issues that we may not need to brief).

Do you want to take a stab at a joint motion?

Jeff

-----Original Message-----

From: "Junk, Michael L. (mjunk@groom.com)" <MJunk@groom.com>
Sent: Monday, May 6, 2019 2:11pm
To: "jdahl@erisaattorneyintexas.com" <jdahl@erisaattorneyintexas.com>
Subject: RE: Keys

Jeff,

I would not be opposed to moving the deadline. Frankly, I would like to move for modification of the case management schedule because, if the case goes forward, I need to file an answer, I need to countersue, and I need to take discovery of Mr. Keys. So the fact that the court has sat on my motion to dismiss for so long has turned the current schedule upside down. For instance, how are we supposed to file dispositive motions when we don't even know what claims are still in the case?

What do you think? Maybe we should discuss at some point?

Michael L Junk / Of Counsel / 1701 Pennsylvania Ave., NW, Suite 1200 / Washington, DC 20006 /
Phone: 202-861-5430 / Fax: 202-659-4503 / www.groom.com / mjunk@groom.com

From: jdahl@erisaattorneyintexas.com <jdahl@erisaattorneyintexas.com>
Sent: Monday, May 6, 2019 12:45 PM
To: Junk, Michael L. (mjunk@groom.com) <MJunk@groom.com>
Subject: RE: Keys

Hi Michael.

Working with Tyrone Keys on trying to get you a settlement offer this week.
Not an easy task.

I notice that our dispositive motion deadline is about 2 weeks after the mediation (June 7th). I also notice that the case management and scheduling order

frowns upon any extension requests for the dispositive motions. However, it seems like we need more time, at least to me. It gives us no time for further discussion, for one thing.

What do you think about risking the court's wrath and submitting a joint motion to extend the dispositive motion deadline for 20 to 30 days? Keeping all other deadlines as is, since in all probability they're unnecessary anyway.

Jeff